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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME TO SUBMIT JOINT OR
COMPETING PROPOSED ORDERS AND
FACTS SHEETS**

This Document Relates to:

ALL ACTIONS

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

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15 *Co-Lead Counsel for Plaintiffs*
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STIPULATION

WHEREAS, on October 6, 2023, the Court ordered that “all outstanding discovery proceedings are stayed, and no further discovery shall be initiated.” Pretrial Order No. 1, Dkt. No. 2;

WHEREAS, on December 6, 2023, the Court ordered Plaintiffs’ Liaison Counsel and Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively “Uber”) to jointly file a proposed pretrial order regarding a discovery plan and schedule for filing a master complaint and initial motions. Pretrial Order No. 4, Dkt. No. 152 at 5;

WHEREAS, the parties were unable to agree on the terms of such an order, and on December 21, they submitted competing proposals and supporting memoranda. Dkt. Nos. 168, 171;

WHEREAS, on December 28, 2023, the Court established a schedule regarding discovery and initial motions. Pretrial Order No. 5, Dkt. No. 175;

WHEREAS, the Court ordered Plaintiffs’ Liaison Counsel to meet and confer with Uber regarding, among other things, the scope and terms of Plaintiff-related discovery, including plaintiff and defense fact sheets. Pretrial Order No. 5, Dkt. No. 175 at 3. The Court further ordered the parties to submit joint or competing proposed orders, along with joint or competing fact sheets, by January 15, 2024. *Id.*; and

WHEREAS, the parties have exchanged draft fact sheets and scheduled a meet and confer to discuss the issues in dispute and agree that extending the deadline to submit joint or competing proposed orders, along with joint or competing fact sheets, to January 24, 2024, will facilitate the efficient resolution of those disputes and conserve judicial resources;

THEREFORE, the parties respectfully request the Court enter the parties’ stipulation that:

By January 24, 2024, the parties shall submit joint or competing proposed orders, along with joint or competing fact sheets. If the parties submit competing proposals, each shall submit a memorandum (not to exceed ten pages) explaining why the Court should adopt that party’s proposal.

1 **IT IS SO STIPULATED.**

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3 Dated: January 11, 2024

**PAUL, WEISS, RIFKIND, WHARTON &
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5 By: /s/ Randall S. Luskey

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14 RASIER, LLC, and RASIER-CA, LLC

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16 Dated: January 11, 2024

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FILER'S ATTESTATION

I, Randall S. Luskey, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: January 11, 2024

By: /s/ Randall S. Luskey
Randall S. Luskey

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**[PROPOSED] ORDER GRANTING
STIPULATION EXTENDING TIME
TO SUBMIT JOINT OR COMPETING
PROPOSED ORDERS AND FACTS
SHEETS**

This Document Relates to:

ALL ACTIONS

The Court hereby GRANTS the parties' stipulation as follows:

By January 24, 2024, the parties shall submit joint or competing proposed orders, along with joint or competing fact sheets. If the parties submit competing proposals, each shall submit a memorandum (not to exceed ten pages) explaining why the Court should adopt that party's proposal.

IT IS SO ORDERED.

Date: _____, 2024

HON. CHARLES R. BREYER
UNITED STATES DISTRICT JUDGE